

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RICHARD O. KLING, M.D., BRENDA
SUTTON, SHIRLEY MORTON, KENYA
TUCKER, HAROLD WIMBUSH, SIMON
ALLISON, PATRICIA HULL, Individually
and On Behalf of All Others Similarly Situated,

Plaintiffs,

v.

THE WORLD HEALTH ORGANIZATION,

Defendant.

Case No. 7:20-cv-03124 (CS)

**NOTICE OF THE WORLD HEALTH ORGANIZATION'S
MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and all prior pleadings and proceedings herein, the undersigned, defendant the World Health Organization, hereby move, pursuant to Federal Rule of Civil Procedure 12(b)(1), (2), and (5), for an order dismissing with prejudice the Second Amended Complaint in its entirety.

Dated: New York, New York
November 2, 2020

DEBEVOISE & PLIMPTON LLP

By: /s/ Catherine Amirfar

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